



April 19, 2023

VIA E-FILING

The Honorable Gregory B. Williams
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801

**RE: *VoiceAge EVS LLC v. HMD Global Oy,*
(C.A. No. 19-cv-1945-GBW)**

Dear Judge Williams:

The parties in the above-referenced matter write to request the scheduling of a discovery teleconference.

The following attorneys participated in a verbal meet-and-confer via Zoom and telephone on April 13, 2023:

Delaware Counsel: Michael Farnan for Plaintiff

Lead Counsel: Rajin Olson and Annie Huang for Plaintiff and William McCabe and Matthew Lembo for Defendant.

While Delaware Counsel for Defendant was unable to attend that meet-and-confer, Delaware Counsel for Plaintiff, Brian Farnan, conferred separately with Delaware Counsel for Defendant, Nate Hoeschen, on April 19, 2023.

The disputes requiring judicial attention at this time are listed below:

1. Whether HMD has possession, custody, or control of technical documents held by third-party Original Design Manufacturers (“ODMs”) by virtue of HMD’s contracts with those ODMs, and whether HMD should be compelled to collect and produce those documents.

Respectfully submitted,

/s/ Michael J. Farnan

Michael J. Farnan

cc: Counsel of Record (via E-File)